# **EXHIBIT A**

Issued by the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS		
SUBPOENA IN	A CIVIL CASE	
Peter J. Foster  3924 Bryn Mawr Dallas, TX 75225  ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al. Civil Action No. 04-10353-PBS United States District Court for the District of Massachusetts		BS
YOU ARE COMMANDED to appear in the United States District Court at the place, date and time specified below to testify in the above case.		
CE OF TESTIMONY		COURTROOM
	ALCON CONTROL OF A	DATE AND TIME
YOU ARE COMMANDED to appear for the taking of a deposition at the place, date, and time specified below to testif with respect to the above-captioned case.		
Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109		DATE AND TIME  January 5, 2005 at 10:00 a.m.
YOU ARE COMMANDED to produce and permit inspect place, date, and time specified below (list documents or ob-	tion and copying of the followi	ng documents or objects at the
ER TO		DATE AND TIME
YOU ARE COMMANDED to permit inspection of the fol	lowing premises at the date and	d time specified below.
ISES	DATE AND TIME	
IG OFFICER NAME, ADDRESS AND PHONE NUMBER Paul E. Bonanno Choate, Hall & Stewart Exchange Place, 53 State Street Boston, Massachusetts 02109 (617) 248-5000		
G OFFICER'S SIGNATURE AND TITLE (INDICATE IF ITEM OF DEFENDANT)  Attorney for defendant Voice Signal Technologies, Inc.	ATTORNEY FOR	DATE /2/13/04
	UNITED STATES NORTHERN DIS  SUBPOENA IN  Peter J. Foster 3924 Bryn Mawr Dallas, TX 75225  YOU ARE COMMANDED to appear in the United State testify in the above case.  E OF TESTIMONY  YOU ARE COMMANDED to appear for the taking of a with respect to the above-captioned case.  E OF TESTIMONY  Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109  YOU ARE COMMANDED to produce and permit inspect place, date, and time specified below (list documents or ob TER TO  YOU ARE COMMANDED to permit inspection of the fol SES  IG OFFICER NAME, ADDRESS AND PHONE NUMBER Paul E. Bonanno Choate, Hall & Stewart Exchange Place, 53 State Street Boston, Massachusetts 02109 (617) 248-5000  G OFFICER'S SIGNATURE AND TITLE (INDICATE IF FIFF OR DEFENDANT)  August  Aggregation  Aggregation  Aggregation  SUBPOENA IN  In the United State  Texthange Place 13 State Street Boston, MASSACHUSE  BOSTON, MASSACHUSE  SUBPOENA IN  SUBPOENA  STATE  SUBPOENA  STATE  SUBPOENA  STATE  SUBPOENA  SUBP	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS  SUBPOENA IN A CIVIL CASE  Peter J. Foster 3924 Bryn Mawr Dallas, TX 75225  ScanSoft, Inc. v. Voice Signat Civil Action No. 04-10353-P United States District Court in District of Massachusetts  YOU ARE COMMANDED to appear in the United States District Court at the place, ditestify in the above case.  E. OF TESTIMONY  YOU ARE COMMANDED to appear for the taking of a deposition at the place, date, are with respect to the above-captioned case.  E. OF TESTIMONY  Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109  YOU ARE COMMANDED to produce and permit inspection and copying of the following place, date, and time specified below (list documents or objects):  TER TO  YOU ARE COMMANDED to permit inspection of the following premises at the date and SES  G. OFFICER NAME, ADDRESS AND PHONE NUMBER Paul E. Bonanno Choate, Hall & Stewart Exchange Place, 53 State Street Boston, Massachusetts 02109 (617) 248-5000  G. OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR TIFF OR DEFENDANT)  A. A

AO 88 (RevC1/94) 15.04pcenta0ia5330446 SaseDocument 197-2 Filed 05/26/2005 Page 2 of 11

## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

RECEIVED

	SEP 2.8 2004
SCANSOFT, INC.,	BROMBERG & SUNSTEIN
Plaintiff,	)
v.	) C.A. No. 04-10353-PBS
VOICE SIGNAL TECHNOLOGIES, INC., LAURENCE S. GILLICK, ROBERT S. ROTH, JONATHAN P. YAMRON, and MANFRED G. GRABHERR,	) ) ) )
Defendants.	) ) )

### NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS

To: All Parties and Their Counsel of Record

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 26, 30, 34, and 45, defendant Voice Signal Technologies, Inc. will take the deposition upon oral examination of Texas Instruments Incorporated, 7839 Churchill Way, MS3999, Dallas, TX 75251. A copy of the deposition subpoena is attached hereto.

The deposition will be conducted at the offices of Storm & Hemingway LLP, 8117

Preston Road, Suite 460, Dallas, TX 75225, and is scheduled to commence at 10:00 a.m. on

October 29, 2004.

PLEASE TAKE FURTHER NOTICE that the deponent has been commanded to testify with respect to the matters listed in Attachment A and to produce the documents specified in Attachment B to the accompanying subpoena.

The deposition shall be taken before a notary public or other officer authorized to administer oaths. The deposition will continue from day to day until completed. You are invited to attend and cross-examine.

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

Robert S. Frank, Jr. (BBO No. 177240)

Sarah Chapin Columbia (BBO No. 550155)

Paul D. Popeo (BBO No. 567727)

Paul E. Bonanno (BBO No. 646838)

CHOATE, HALL & STEWART

Exchange Place, 53 State Street

Boston, MA 02109

(617) 248-5000

Dated: September 27, 2004

3740236\_1.DOC

I HEREBY CERTIFY THAT A TRUE COPY OF THE ABOVE DOCUMENT WAS SERVED UPON THE ATTORNEY OF RECORD FOR EACH OTHER PARTY BY MAIL/HAND ON

DATE 9/21/04 SIGNATURE Paul Some

*					
$\bigcirc$	Issued by the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS				
	SUBPOENA	SUBPOENA IN A CIVIL CASE			
TO:	Thomas B. Schalk	ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al. Civil Action No. 04-10353-PBS United States District Court for the District of Massachusetts			
	YOU ARE COMMANDED to appear in the United States District Court at the place, date and time specified below to testify in the above case.				
PLAC	CE OF TESTIMONY		COURTROOM		
			DATE AND TIME		
X	YOU ARE COMMANDED to appear for the taking of with respect to the above-captioned case.	a deposition at the place, date, a	nd time specified below to testif		
PLAC	CE OF TESTIMONY  Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109		DATE AND TIME  January 10, 2005 at 10:00 a.m.		
	YOU ARE COMMANDED to produce and permit insp place, date, and time specified below (list documents or	ection and copying of the follow objects):	ing documents or objects at the		
DELL	VER TO		DATE AND TIME		
	YOU ARE COMMANDED to permit inspection of the	following premises at the date an	d time specified below.		
PREM	EMISES		DATE AND TIME		
ISSUI	NG OFFICER NAME, ADDRESS AND PHONE NUMB Paul E. Bonanno Choate, Hall & Stewart Exchange Place, 53 State Street Boston, Massachusetts 02109 (617) 248-5000	ER			
	NG OFFICER'S SIGNATURE AND TITLE (INDICATE TIFF OR DEFENDANT)	IF ATTORNEY FOR	DATE		
· \	Attorney for defendant Voice Signal Technologies, Inc.		12/13/04		

AO 88 (RevCaled) 1504 poor 1935 3- CHB Case ocument 197-2 Filed 05/26/2005 Page 5 of 11

### UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JAN 13 2005
BROMBERG & SUNSTEIN

SCANSOFT, INC.,

Plaintiff,

v.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC., LAURENCE S. GILLICK, ROBERT S. ROTH, JONATHAN P. YAMRON, and MANFRED G. GRABHERR,

Defendants.

To: Lee Carl Bromberg, Esq.

Robert Asher, Esq. Julia Huston, Esq. Lisa M. Fleming, Esq. Jack C. Schecter, Esq.

BROMBERG & SUNSTEIN LLP

125 Summer Street Boston, MA 02110-1618

#### NOTICE OF RULE 30(b)(6) DEPOSITION OF SCANSOFT, INC.

Please take notice that, pursuant to Fed. R. Civ. P. 30(b)(6), defendant and counterclaim plaintiff Voice Signal Technologies, Inc. will take the deposition upon oral examination of plaintiff and counterclaim defendant ScanSoft, Inc. ("ScanSoft") on Friday, January 21, 2005 beginning at 10:00 a.m. The deposition shall be conducted at the offices of Choate, Hall & Stewart, 33<sup>rd</sup> Floor, Exchange Place, Boston, Massachusetts 02109, before an official authorized by law to administer oaths. The deposition shall be recorded by stenographic means and shall continue through the day until completed.

Please take further notice that, pursuant to Fed. R. Civ. P. 30(b)(6), ScanSoft shall designate to testify concerning each of the matters set forth in the attached **Schedule A** one or more of its officers, directors, managing agents or other persons who consent to testify on its behalf.

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

Robert S. Frank, Jr. (BBO No. 177240)

Sarah Chapin Columbia (BBO No. 550155)

Paul D. Popeo (BBO No. 567727)

Paul E. Bonanno (BBO No. 646838)

CHOATE, HALL & STEWART

Exchange Place

53 State Street

Boston, MA 02109

(617) 248-5000

Dated: January 12, 2005 3781255\_1.DOC

	Issued by the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS		
	SUBPOENA IN A CIVIL CASE		
TO:	Civil Action No. 04-1035	ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al. Civil Action No. 04-10353-PBS United States District Court for the District of Massachusetts	
	YOU ARE COMMANDED to appear in the United States District Court at the place testify in the above case.	e, date and time specified below to	
PLA	CE OF TESTIMONY	COURTROOM	
		DATE AND TIME	
X	YOU ARE COMMANDED to appear for the taking of a deposition at the place, date with respect to the above-captioned case.	e, and time specified below to testify	
PLAC	CE OF TESTIMONY  Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109	January 4, 2005 at 10:00 a.m.	
. )	YOU ARE COMMANDED to produce and permit inspection and copying of the foll place, date, and time specified below (list documents or objects):	owing documents or objects at the	
DELI	VER TO	DATE AND TIME	
	YOU ARE COMMANDED to permit inspection of the following premises at the date	e and time specified below.	
PREM	IISES .	DATE AND TIME	
SSUI	NG OFFICER NAME, ADDRESS AND PHONE NUMBER Paul E. Bonanno Choate, Hall & Stewart Exchange Place, 53 State Street Boston, Massachusetts 02109 (617) 248-5000		
	NG OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR STIFF OR DEFENDANT)  Attorney for defendant Voice Signal Technologies, Inc.	DATE 12/13/04	

AO 88 (Rev.Classe) 18.01stporente018.5a39RB \$CaseDocument 197-2 Filed 05/26/2005

Page 8 of 11

AO 8	88 (Rev. 1/94) Subpoena in a Civil Case Case 1:04-cv-10353-PBS Do	cument 197-2 Filed 05/26/2005 Page 9 of 11
		Issued by the ED STATES DISTRICT COURT RAL DISTRICT OF CALIFORNIA
		BPOENA IN A CIVIL CASE
TO:	Sam S. Viglione P.O. Box 993 Big Bear Lake, CA 92315  ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al. Civil Action No. 04-10353-PBS United States District Court for the District of Massachusetts	
	YOU ARE COMMANDED to appear in the testify in the above case.	United States District Court at the place, date and time specified below to
PLAC	E OF TESTIMONY	COURTROOM
	* 9	DATE AND TIME
X	YOU ARE COMMANDED to appear for the with respect to the above-captioned case.	e taking of a deposition at the place, date, and time specified below to testify
PLACI	E OF TESTIMONY  Northwoods Resort 40650 Village Drive Big Bear Lake, CA	
P )	YOU ARE COMMANDED to produce and I date, and time specified below.	permit inspection and copying of the documents listed below at the place,
DELIV	ER TO	DATE AND TIME
J .	YOU ARE COMMANDED to permit inspect	ion of the following premises at the date and time specified below.
PREMIS	SES	DATE AND TIME
] ( ]	G OFFICER NAME, ADDRESS AND PHON Paul E. Bonanno Choate, Hall & Stewart Exchange Place, 53 State Street Boston, Massachusetts 02109 (617) 248-5000	IE NUMBER
LAINI	G OFFICER'S SIGNATURE AND TITLE (IN IFF OR DEFENDANT)  Attorney for defendant Voice Signal Tecknolo	4/14/05

Ã0 8	8 (RevC1/94) 15g4po	ள்றுந்து பிழ் Sas Document	197-2 Filed 05/26/2005	Page 10 of 11
; <del>-</del>		UNITED STATE	ued by the ES DISTRICT COURT F MASSACHUSETTS	
		SUBPOENA	IN A CIVIL CASE	8
TO:	Fadi Kaake		ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al. Civil Action No. 04-10353-PBS United States District Court for the District of Massachusetts	
	YOU ARE COMMA testify in the above ca		tates District Court at the place, o	late and time specified below to
PLAC	E OF TESTIMONY			COURTROOM
	7			DATE AND TIME
X	YOU ARE COMMAI with respect to the abo		f a deposition at the place, date, a	and time specified below to testify
PLAC	E OF TESTIMONY	Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109		DATE AND TIME February 14, 2005 at 10:00 a.m.
X		NDED to produce and permit inspete, and time specified below.	pection and copying of the docum	nents listed on Attachment A
DELIV	ER TO	Choate, Hall & Stewart Exchange Place 53 State Street Boston, MA 02109		DATE AND TIME February 7, 2005 at 10:00 a.m.
	YOU ARE COMMAN	DED to permit inspection of the	following premises at the date at	nd time specified below.
PREMI	ISES		and the second s	DATE AND TIME
SSUIN	Paul E. Bonanno Choate, Hall & Steward Exchange Place, 53 Sta Boston, Massachusetts (617) 248-5000	te Street	BER	
	IG OFFICER'S SIGNA TIFF OR DEFENDANT	TURE AND TITLE (INDICATE	E IF ATTORNEY FOR	DATE 2/1/05
	Attorney for defendant	Voice Signal Technologies, Inc.		